

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>Chapter:</b>	<b>13</b>
	:		
<b>John E. Redman, III aka John E. Redman, Debtor</b>	:	<b>Case No.</b>	<b>5:18-bk-00755-RNO</b>
	:		
<b>Toyota Lease Trust, Movant</b>	:	<b>Document No.</b>	<b>34-1</b>
	:		<b>Relief of stay</b>
<b>vs.</b>	:		
<b>John E. Redman III aka John E. Redman Respondent</b>	:		
	:	<b>Judge Robert N. Opel, II</b>	
<b>Charles J. DeHart, III, Chapter 13 Trustee,</b>	:		

**RESPONSE OF JOHN E. REDMAN, III TO THE MOTION  
FOR RELIEF OF TOYOTA LEASE TRUST FOR  
RELIEF FROM AUTOMATIC STAY 11 U.S.C. SECTION 362**

AND NOW COMES, the above Debtor by his attorneys, Doran & Doran, P.C.  
and responds to the Motion of Toyota Lease Trust for relief of stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Movant is not a secured creditor in this case.
6. Admitted.
7. Admitted.

8. Denied. It is denied there is any balance due under the Lease because the Debtor made the payments that were required and turned in the vehicle when the Lease ended.

9. Admitted.
10. Admitted.
11. Admitted.

**WHEREFORE**, the Debtor disagrees that there is any balance owed under the Lease, but the Debtor has no objection to Movant being able to enforce its rights against the



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<b>Charles J. DeHart, III, Chapter 13 Trustee</b>	:		

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on March 25, 2019 a copy of the *Response of Debtor to Motion of Toyota Lease Trust for Relief from Automatic Stay* is served electronically on the parties shown below upon filing:

James Warmbrodt, attorney for Toyota Lease Trust [jwarmbrodt@kmlawgroup.com](mailto:jwarmbrodt@kmlawgroup.com)

Charles J. DeHart, III, Trustee – [dehartstaff@pamd13trustee.com](mailto:dehartstaff@pamd13trustee.com), [TFecf@pamd13trustee.com](mailto:TFecf@pamd13trustee.com)

United States Trustee - [ustpreion03.ha.ecf@usdoj.gov](mailto:ustpreion03.ha.ecf@usdoj.gov)

I certify under penalty of perjury that the foregoing is true and correct.

Dated: 3-25-2019

Name: /s/ Lisa M. Doran  
Doran & Doran, P.C.  
69 Public Square – Ste 700  
Wilkes Barre, PA 18702